

Example 1:

Utility admin procedure high-level requirement stating: *Configuration control of the plant PRA Models SHALL be maintained.*

Relevant IP Step:

03.02.a.1 Review PCC related administrative procedures to ensure that PCC processes are in place and are being followed.

Example Analysis:

- This step is open to interpretation due to the timing aspect.
- A plant change that has not been evaluated or incorporated into the model at the time the change is implemented into the plant may be considered a non-compliance of our procedure and a performance deficiency.
- A plant change that was evaluated and incorporated/not incorporated into the model without documentation that meets the PRA Standard may be considered an issue of concern

Enforcement:

- No PD - Issue was only the result of inadequate documentation of the basis for the change, and utility has processes for tracking/incorporation of plant changes and can describe the basis for incorporating/not incorporating OR change is tracked for future evaluation.
- Minor - Documentation is an issue of concern and our process did not ensure impacts to the PRA receive evaluation/documentation. Cornerstone not adversely impacted.
- MTM (more than minor) - Change that wasn't evaluated or incorporated adversely affected an associated cornerstone; significance depends on risk and exposure time.

Example 2:

Utility admin procedure step that states: *...ensure common-backbone model (CBM) logic changes are checked for proper impact to other hazards.*

Relevant IP Step:

03.03 *Verify processes and procedures were completed appropriately to ensure the PRA program was being sufficiently maintained to support past and current Risk-Informed decisions.*

Example Analysis:

- The utility conducted a specific hazard PRA update at a site and the internal events model was impacted in an unexpected way, which was found after model signoff during the MSPI update. This may be considered a performance deficiency.

Enforcement:

- No PD – Licensee identified the issue prior to inspection or use for any application and initiated corrective action commensurate with risk impact per procedures, error not systematic or systematic issue corrected.
- Minor - Issue was NRC-identified, the impact can be shown to be of negligible impact and the utility initiated corrective action OR issue was licensee identified and corrective action initiated after use for Risk-Informed decisions.
- MTM – NRC or licensee identified after use for Risk-Informed decisions and the issue cannot be shown to be of negligible impact; actual impact to cornerstone (e.g. actual MSPI margin not understood and exceeded due to error, actual maintenance rule/RICT evaluations impacted); significance depends on risk and exposure time.

Example 3:

Utility admin procedure step that states:...*continuous monitoring of PRA inputs against various changes (e.g., plant changes, change in state of knowledge, methodology changes...*

Relevant IP Step:

03.02.a.1 Review PCC related administrative procedures to ensure that PCC processes are in place and are being followed.

Example Analysis:

- Failure to include newly released industry guidance, or significant information, in the model log for tracking, or failure to document/disposition the guidance, may be considered an issue of concern

Enforcement:

- No PD – Issue is being tracked for evaluation and incorporation/non-incorporation. PRA models not impacted (or insignificantly impacted) or the information was not applicable as dispositioned.
- Minor – New information was not tracked for evaluation, but PRA models could be impacted by the new information or not adequately dispositioned/documenting.